

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
(PHILADELPHIA)**

IN RE:

Elena Papanikolaou

Debtor(s).

CHAPTER 13

CASE NO.: 19-11134-pmm

**NOTICE OF ENTRY OF APPEARANCE  
AND DEMAND FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE that NewRez LLC d/b/a Shellpoint Mortgage Servicing (“NewRez”), secured creditor to the above entitled Debtors by and through its undersigned counsel, hereby enters its appearance pursuant to Bankruptcy Rule 9010(b); and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3007 and 9007 and Section 342 of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the above-captioned case be given and served upon the undersigned at the following addresses and telephone/facsimile numbers:

Angela C. Pattison, Esq.  
Hill Wallack LLP  
1415 Route 70 East, Suite 309  
Cherry Hill, NJ 08034  
Telephone: 856-616-8086  
Facsimile: 856-616-8081  
Email: [apattison@hillwallack.com](mailto:apattison@hillwallack.com)

PLEASE TAKE FURTHER NOTICE that neither this Notice of Entry of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive NewRez LLC d/b/a Shellpoint Mortgage Servicing (i) right to have final orders in non-core

matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which NewRez LLC d/b/a Shellpoint Mortgage Servicing is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: March 19, 2024

Hill Wallack LLP

By: /s/ Angela C. Pattison  
Angela C. Pattison, Esq.  
Hill Wallack LLP  
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Counsel to NewRez LLC d/b/a Shellpoint Mortgage  
Servicing

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**CERTIFICATE OF SERVICE**

I hereby certify that service was made upon all interested parties, indicated below of (i) Notice of Appearance for NewRez LLC d/b/a Shellpoint Mortgage Servicing in the manner indicated below on March 19, 2024:

Elena Papanikolaou  
3927 Dove Circle  
Huntington Valley, PA 19006

**Debtor**

**Via Regular Mail**

BRANDON J PERLOFF

Brandon Perloff PC

1830 Lombard Street

Ste 11a

Philadelphia, PA 19146

**Counsel for Debtor**

**Via ECF**

Office of the U.S. Trustee  
Robert N.C. Nix Federal Building  
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Suite 320

Philadelphia, PA 19107

**United States Trustee**

**Via ECF**

KENNETH E. WEST

Office of the Chapter 13 Standing Trustee

1234 Market Street - Suite 1813

Philadelphia, PA 19107

**Chapter 13 Trustee**

**Via ECF**

By: /s/ Angela C. Pattison

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